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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

MARK FITZ, GRAYGUNS, INC.;
G4 ARCHERY; SECOND
AMENDMENT FOUNDATION; and
FIREARMS POLICY COALITION,
INC.,

Plaintiffs,

v.

ELLEN ROSENBLUM, in her official capacity as Attorney General of the State of Oregon; and TERRI DAVIE, in her official capacity as Superintendent of the Oregon State Police,

Defendants.

Case No.

DECLARATION OF ALAN GOTTLIEB IN SUPPORT OF PLAINTIFFS' EMERGENCY MOTIONS FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

I, Alan Gottlieb, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct to the best of my knowledge:

1. I am over 18 years of age, competent to testify, and have personal knowledge of the matters stated herein. I make this Declaration in support of plaintiffs' emergency motions for a temporary restraining order and preliminary injunction.

2. I am the Executive Vice President of the Second Amendment Foundation (“SAF”) and which I founded in 1974. As Executive Vice President, I am duly authorized to act on behalf of the organization. SAF is a tax-exempt nonprofit organization under section 501(c)(3) of the Internal Revenue Code, incorporated under the laws of Washington, with its principal place of business in Bellevue, Washington.

3. In my role as Executive Vice President, I am familiar with SAF’s Purposes as an organization, SAF’s membership, and SAF’s organizational responses to Oregon.

4. SAF seeks to preserve the effectiveness of the Second Amendment through education, research, publishing, and legal action programs focused on the constitutionally protected right to possess firearms and ammunition, and the consequences of gun control.

5. SAF has over 700,000 members and supporters nationwide, including thousands of members in the State of Oregon.

6. One membership benefit SAF provides to its members is an ability to participate in SAF’s mission and to support SAF’s work.

7. SAF brings this lawsuit on behalf of itself and its thousands of members in Oregon in a representative capacity.

8. SAF’s membership includes numerous individuals and businesses who will be harmed by the enforcement of Ballot Measure 114’s regulation of the purchase, possession, production, sale, and transfer of magazines capable of holding more than 10 rounds of ammunition, including Plaintiff Mark Fitz and Bruce Gray, Jessica Harris, and Jason Harris – who are principals of Grayguns, Inc. and G4 Archery, LLC respectively.

DATED this 30th day of November, 2022.



Alan Gottlieb
Executive Vice President
Second Amendment Foundation